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**MEMO ENDORSED**

Daniel Patrick Moynihan  
United States Courthouse  
40 Foley Square, Courtroom 705  
New York, NY 10007-1312  
Attn: The Honorable Paul G. Gardephe  
Via: ECF

*The application is denied. In the judgment, the Court recommended that the Defendant be designated to a facility as close as possible to the New York City metropolitan area. Adding the names of the facilities -- as counsel requests -- would accomplish nothing. As to the request to delay surrender, the Court gave the Defendant 60 days to surrender. That time period will not be extended.*

**SO ORDERED:**

**Re: Judgement Modification and Surrender Date, 1:22-cr-00514-PGG  
United States v. Louis Jeune Verly**

*Paul G. Gardephe*  
Paul G. Gardephe, U.S.D.J.

Dated: *April 3, 2024*

Dear Judge Gardephe:

Greetings. Yesterday, my office was retained to represent Mr. Verly on two limited matters<sup>1</sup>:

1) I ask the Court to amend its judgement order to reflect that Mr. Verly would like to be imprisoned at FCI Otisville, Fort Dix, or FCI Danbury because, as of now, the Bureau of Prisons has placed him in Louisiana far away from his family and friends;

2) I move the Court to extend his surrender date to April 29, 2024 as he advises his half-sisters father, Toper Noel, passed away in late March, and Mr. Verly would like to attend his funeral.

The funeral will take place once Mr. Noel's body is transported to the New York City Metropolitan Area from Haiti, where he passed away. As of now, his surrender date is April 8, 2024. These requests have no objection from his pretrial services officer, and the United States Attorney's Office has no objection to Mr. Verly's request to be incarcerated in an institution closer to New York; the United States Attorney's Office does

<sup>1</sup> As the Court is aware, my office did represent Rashaan Richards in 1:22-cr-00514-PGG. However, I do not think a *Curcio* Hearing is necessary due to the highly limited nature of this application, the irrelevance of Rashaan Richards' case to this application, and no benefactor payment was made pursuant to your individual rules.



*Paul D. Petrus Jr.*

Attorney at Law & Associates, P.C.

object to the later surrender date per my call and conversation on April 2, 2024.

Please advise.

Sincerely,

A handwritten signature in black ink, appearing to read 'Paul D. Petrus Jr.'.

Paul D. Petrus Jr., Esq.

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